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December 23, 1996

VIA HAND DELIVERY

Mr. William F. Caton **Acting Secretary Federal Communications Commission Room 222** 1919 M Street, N.W. Washington, D.C. 20554

Re:

Advanced Television Systems

and Their Impact Upon the Existing

Television Broadcast Service

MM Docket 87-268

Dear Mr. Caton:

On behalf of Lans Service Corporation, I am filing an original and fourteen (14) copies of its Reply Comments in the above-referenced proceeding.

Please communicate with us if additional information is required.

Very truly yours,

.ETCHER, FREALD & HILDRETH, P.L.C.

Counsel for Lans Service Corporation

GP:cei **Enclosures**

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BEFORE THE

Federal Communications Commission

WASHINGTON, D.C. 20554

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In the Matter of
)
Advanced Television Systems
) MM Docket No. 87-268
and Their Impact Upon the
Existing Television Broadcast
)
Service
)

REPLY COMMENTS OF THE LANS SERVICE CORPORATION

Lans Service Corporation ("Lans"), by counsel, hereby submits reply comments in response to the Commission's <u>Sixth Further Notice of Proposed Rulemaking</u> in the above-captioned proceeding. Briefly, Lans wishes to highlight and support the comments of Motorola, Inc., and of others, on the highly important issues raised by the Commission's proposal in its <u>Sixth Further Notice</u> to "short-space" a number of DTV channel allocations with land mobile operations on frequencies in the 470 - 512 MHz bands. Lans Service is particularly concerned about and wishes to bring to the Commission's attention the potential for destructive interference of the Commission's proposal to allocate DTV Channel 16 to New Haven, Connecticut. Because of the geography involved, a Channel 16 television station in New Haven would simply not be compatible with land mobile operations on Channel 15 frequencies in New York City.

Lans Service Corporation operates extensive land mobile radio facilities on several frequencies within TV Channel 15 (476 - 482 MHz). The base/repeater station facilities operate from the top of several tall buildings in Manhattan, such as the World

Trade Center, the Chrysler Building, the Pan Am Building, an other tall Manhattan structures. These radio facilities are heavily used to dispatch hundreds of taxicabs, limousines, and other commercial passenger vehicles. Lans Service has invested millions in its communications system and a substantial segment of the taxicab and livery industry in New York relies on that communications system. Therefore, the facilities involved are important, and serve an important transportation industry in the New York City and vicinity.

In its Sixth Further Notice, the Commission established as desirable minimum separations between land mobile systems and DTV assignments, 155 miles for cochannel and 110 miles for adjacent channels. Presumably, these minimum separations assume average terrain. The distance between New Haven and New York City, center to center, is 111 km, or less than 70 miles, over 40 miles less than the desirable minimum. Moreover, there is practically unobstructed line of site between Manhattan's tall buildings and New Haven and that line of site is over water, the Long Island Sound. Further, land mobile stations may be authorized to operate as far as 50 miles from the city center so that, potentially land mobile base stations can be as close as 20 miles to New Haven city center. Mobile stations may operate up to 30 miles from their associated base stations so that mobile units could actually operate in New Haven itself. The interference potential is thus obvious. The interference problem will be serious even with respect to land mobile stations operating on Channel 15 frequencies within New York City. Interference with those systems is expected because of the unobstructed line of site between the tall building in Manhattan and New Haven over

the Long Island Sound.

Therefore, the proposal to allocate Channel 16 to New Haven is flawed¹ and should not be adopted. If the Commission, nevertheless, decides to adopt this proposal, the allocation should be footnoted with information about the interference potential and should be conditioned so that land mobile operations on Channel 15 frequencies in the New York City area would be protected from interference from any DTV stations on Channel 16 in the New Haven market.

Respectfully submitted,

LANS SERVICE CORPORATION

George Petrutsas

It Attorney

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Dated: December 23, 1996

cej/gp/gp#4/lans.plead

¹The proposal has other problems. It is inconsistent with the Commission's recent decision to authorize police departments in the New York City area to operate land mobile facilities on frequencies within Channel 16 itself, it violates the minimum TV to TV separation requirements with respect to TV Channel 15 proposed for Providence, R.I., and it is "short-spaced" with co-channel land mobile operations in Boston.